

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FRONTIER AIRLINES, INC.,

Plaintiff,

v.

AMCK AVIATION HOLDINGS IRELAND
LIMITED, ACCIPITER INVESTMENT 4
LIMITED, VERMILLION AVIATION (TWO)
LIMITED, ACCIPITER HOLDINGS DAC,
CARLYLE AVIATION MANAGEMENT
LIMITED, MAVERICK AVIATION HOLDINGS
LIMITED, MANCHESTER AVIATION
FINANCE S.a.r.l., VERMILLION AVIATION
HOLDINGS LIMITED, WELLS FARGO TRUST
COMPANY, N.A., solely in its capacity as
OWNER TRUSTEE, and UMB BANK, N.A.,
solely in its capacity as OWNER TRUSTEE,

Defendants.

Case No.: 1:22-cv-02943 (PAE)

MOTION AND [PROPOSED] ORDER TO WITHDRAW AS COUNSEL

PLEASE TAKE NOTICE that, upon the annexed declaration of Emily Werkmann, and subject to the approval of the Court, Emily Werkmann hereby withdraws as counsel for Defendants Accipiter Investments Aircraft 4 Limited, Vermillion Aviation (Two) Limited, Accipiter Holdings DAC, Wells Fargo Trust Company, N.A., solely in its capacity as Owner Trustee, and UMB Bank, N.A., solely in its capacity as Owner Trustee ("Defendants"), and shall be removed from the CM/ECF notification list in the above-captioned matter. Jed M. Schwartz and Samantha Lovin of Milbank LLP and Jeff E. Butler of Clifford Chance LLP will continue to represent Defendants in this action.

Dated: February 14, 2024
New York, New York

MILBANK LLP

By: /s/ Emily Werkmann

Emily Werkmann

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New York, New York 10001

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*Counsel for Defendants Accipiter Investments
Aircraft 4 Limited, Vermillion Aviation (Two)
Limited, Accipiter Holdings DAC, Wells Fargo
Trust Company, N.A., solely in its capacity as
Owner Trustee, and UMB Bank, N.A., solely in
its capacity as Owner Trustee*

SO ORDERED: _____

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SOUTHERN DISTRICT OF NEW YORK**

FRONTIER AIRLINES, INC.,

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v

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AMCK AVIATION HOLDINGS IRELAND
LIMITED, ACCIPITER INVESTMENT 4
LIMITED, VERMILLION AVIATION
(TWO) LIMITED, ACCIPITER HOLDINGS
DAC, CARLYLE AVIATION
MANAGEMENT LIMITED, MAVERICK
AVIATION HOLDINGS LIMITED,
MANCHESTER AVIATION FINANCE
S.a.r.l., VERMILLION AVIATION
HOLDINGS LIMITED, WELLS FARGO
TRUST COMPANY, N.A., solely in its
capacity as OWNER TRUSTEE, and UMB
BANK, N.A., solely in its capacity as OWNER
TRUSTEE,

Defendants.

Case No.: 1:22-cv-02943 (PAE)

DECLARATION OF EMILY WERKMANN

EMILY WERKMANN, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am associated with the law firm Milbank LLP, counsel for Defendants Accipiter Investments Aircraft 4 Limited, Vermillion Aviation (Two) Limited, Accipiter Holdings DAC, Wells Fargo Trust Company, N.A., solely in its capacity as Owner Trustee, and UMB Bank, N.A., solely in its capacity as Owner Trustee (“Defendants”), in the above-captioned action. I submit

this declaration in compliance with Local Rule 1.4 to notify the Court that I am withdrawing as counsel for Defendants.

2. Jed M. Schwartz and Samantha Lovin of Milbank LLP and Jeff E. Butler of Clifford Chance LLP will continue to represent Defendants in this action.

3. My withdrawal will not delay the matter or prejudice any party.

4. I am not asserting a retaining or charging lien.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 14, 2024
New York, New York

/s/ Emily Werkmann

Emily Werkmann